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## Deposition/Mediation - Cunningham v. Wallace and Graham

34 messages

Andrew Perrong <a@perronglaw.com>

Fri, Mar 14, 2025 at 4:56 PM

To: Anthony Paronich <anthony@paronichlaw.com>, "Flynn, Virginia Bell" <Virginia.Flynn@troutman.com>, "Fuller, Chad" <Chad.Fuller@troutman.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>, "Nowland, Christine E." <Christine.Nowland@troutman.com>

Counsel:

We are in receipt of your motion for leave to file a third party complaint. Any word on working on a mediator proposal, since I know we were both working on getting depositions scheduled around the same time?

--

Thank you kindly,  
Andrew Perrong, Esq.  
Perrong Law LLC  
2657 Mount Carmel Avenue  
Glenside, PA 19038  
215-225-5529 (CALL-LAW)

---

Flynn, Virginia Bell <Virginia.Flynn@troutman.com>

Fri, Mar 14, 2025 at 5:43 PM

To: Andrew Perrong <a@perronglaw.com>, Anthony Paronich <anthony@paronichlaw.com>, "Fuller, Chad" <Chad.Fuller@troutman.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>, "Nowland, Christine E." <Christine.Nowland@troutman.com>

We are gathering names and will report back!

### Virginia Bell Flynn

Partner

**troutman pepper locke**

Direct: 704.916.1509 | Mobile: 843.847.9766

[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

---

From: Andrew Perrong <a@perronglaw.com>

Sent: Friday, March 14, 2025 2:56:12 PM

To: Anthony Paronich <anthony@paronichlaw.com>; Flynn, Virginia Bell <Virginia.Flynn@troutman.com>; Fuller, Chad <Chad.Fuller@troutman.com>; Conkle, Brooke K. <Brooke.Conkle@troutman.com>; Nowland, Christine E. <Christine.Nowland@troutman.com>

Subject: Deposition/Mediation - Cunningham v. Wallace and Graham

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**Andrew Perrong** <a@perronglaw.com>

Fri, Mar 14, 2025 at 5:44 PM

To: "Flynn, Virginia Bell" <Virginia.Flynn@troutman.com>

Cc: Anthony Paronich <anthony@paronichlaw.com>, "Fuller, Chad" <Chad.Fuller@troutman.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>, "Nowland, Christine E." <Christine.Nowland@troutman.com>

Excellent, we will work on getting some names as well; hopefully there's some overlap to make the process easier.

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

---

**Flynn, Virginia Bell** <Virginia.Flynn@troutman.com>

Sat, Mar 15, 2025 at 7:29 AM

To: Andrew Perrong <a@perronglaw.com>

Cc: Anthony Paronich <anthony@paronichlaw.com>, "Fuller, Chad" <Chad.Fuller@troutman.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>, "Nowland, Christine E." <Christine.Nowland@troutman.com>

Our client still believes Rene Trehy is the best in North Carolina. Are yall ok with me checking for dates?

## Virginia Bell Flynn

Partner

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Direct: 704.916.1509 | Mobile: 843.847.9766

[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

---

**From:** Andrew Perrong <a@perronglaw.com>

**Sent:** Friday, March 14, 2025 3:44:26 PM

**To:** Flynn, Virginia Bell <Virginia.Flynn@troutman.com>

**Cc:** Anthony Paronich <anthony@paronichlaw.com>; Fuller, Chad <Chad.Fuller@troutman.com>; Conkle, Brooke K. <Brooke.Conkle@troutman.com>; Nowland, Christine E. <Christine.Nowland@troutman.com>

**Subject:** Re: Deposition/Mediation - Cunningham v. Wallace and Graham

[Quoted text hidden]

---

**Andrew Perrong** <a@perronglaw.com>

Sat, Mar 15, 2025 at 1:37 PM

To: "Flynn, Virginia Bell" <Virginia.Flynn@troutman.com>

Cc: Anthony Paronich <anthony@paronichlaw.com>, "Fuller, Chad" <Chad.Fuller@troutman.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>, "Nowland, Christine E." <Christine.Nowland@troutman.com>

As we articulated in our motion, we will not mediate with Ms. Trehy.

As alternatives, we suggest the following:

Hon. David Jones (Ret.): <https://judgejonesadr.com/>

Former NC Justice Jimmy Ervin: <https://www.brookspierce.com/people-sam-ervin-iv>

We can also suggest:

Mike Carnahan: <https://mikesmediations.com/>

Judge Pryor: <http://willpryor.com/wordpress>

John Brookman: <https://www.nadn.org/john-brookman>

On Sat, Mar 15, 2025 at 7:29 AM Flynn, Virginia Bell <Virginia.Flynn@troutman.com> wrote:

Our client still believes Rene Trehy is the best in North Carolina. Are yall ok with me checking for dates?

**Virginia Bell Flynn**

**Partner**

**troutman pepper locke**

Direct: 704.916.1509 | Mobile: 843.847.9766

[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

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**From:** Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>

**Sent:** Friday, March 14, 2025 3:44:26 PM

**To:** Flynn, Virginia Bell <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>

**Cc:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>; Fuller, Chad <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>; Conkle, Brooke K. <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>; Nowland, Christine E. <[Christine.Nowland@troutman.com](mailto:Christine.Nowland@troutman.com)>

**Subject:** Re: Deposition/Mediation - Cunningham v. Wallace and Graham

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Excellent, we will work on getting some names as well; hopefully there's some overlap to make the process easier.

[Quoted text hidden]

---

**Anthony Paronich** <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

Mon, Mar 24, 2025 at 11:18 AM

To: Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>

Cc: "Flynn, Virginia Bell" <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>, "Fuller, Chad" <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>, "Conkle, Brooke K." <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>, "Nowland, Christine E." <[Christine.Nowland@troutman.com](mailto:Christine.Nowland@troutman.com)>

Hello, all. Following up here.

----

Anthony Paronich  
Paronich Law, P.C.  
350 Lincoln Street, Suite 2400  
Hingham, MA 02043  
[o] (617) 485-0018  
[c] (508) 221-1510  
[f] (508) 318-8100

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**Flynn, Virginia Bell** <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>

Mon, Mar 24, 2025 at 11:20 AM

To: Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>, Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>

Cc: "Fuller, Chad" <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>, "Conkle, Brooke K." <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

We are going back and forth with our client. As you can imagine, you get a bunch of lawyers in the room.... Hopefully we can nail this down in the next day or two.

**Virginia Bell Flynn**

**Partner**

**troutman pepper locke**

Direct: 704.916.1509 | Mobile: 843.847.9766

**From:** Anthony Paronich <anthony@paronichlaw.com>  
**Sent:** Monday, March 24, 2025 11:19 AM  
**To:** Andrew Perrong <a@perronglaw.com>  
**Cc:** Flynn, Virginia Bell <Virginia.Flynn@troutman.com>; Fuller, Chad <Chad.Fuller@troutman.com>; Conkle, Brooke K. <Brooke.Conkle@troutman.com>; Nowland, Christine E. <Christine.Nowland@troutman.com>  
**Subject:** Re: Deposition/Mediation - Cunningham v. Wallace and Graham

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**Flynn, Virginia Bell** <Virginia.Flynn@troutman.com> Thu, Mar 27, 2025 at 10:00 AM  
To: Anthony Paronich <anthony@paronichlaw.com>, Andrew Perrong <a@perronglaw.com>  
Cc: "Fuller, Chad" <Chad.Fuller@troutman.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>

Our clients feel very strongly about the following options:

Jacqueline R. Clare - Mediator & Arbitrator based in Raleigh, North Carolina.

(23) Jim Gale | LinkedIn

Let us know and we can reach out about dates.

## Virginia Bell Flynn

Partner

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Direct: 704.916.1509 | Mobile: 843.847.9766

[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

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---

**Anthony Paronich** <anthony@paronichlaw.com> Thu, Mar 27, 2025 at 5:19 PM  
To: Virginia Bell Flynn <Virginia.Flynn@troutman.com>  
Cc: Andrew Perrong <a@perronglaw.com>, Chad Fuller <Chad.Fuller@troutman.com>, "Brooke K. Conkle" <Brooke.Conkle@troutman.com>

Any TCPA plaintiffs attorneys I can call about any of them?

On Mar 27, 2025, at 7:01 AM, Flynn, Virginia Bell <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)> wrote:

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**Flynn, Virginia Bell** <Virginia.Flynn@troutman.com>

Thu, Mar 27, 2025 at 6:22 PM

To: Anthony Paronich <anthony@paronichlaw.com>

Cc: Andrew Perrong <a@perronglaw.com>, "Fuller, Chad" <Chad.Fuller@troutman.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>

Not that I know. These are recs from our clients based upon their experience with the NC statute. But these are Plaintiffs lawyers being sued ;)

## Virginia Bell Flynn

Partner

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Direct: 704.916.1509 | Mobile: 843.847.9766

[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

---

**From:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

**Sent:** Thursday, March 27, 2025 5:19:33 PM

**To:** Flynn, Virginia Bell <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>

**Cc:** Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>; Fuller, Chad <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>; Conkle, Brooke K. <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

**Subject:** Re: Deposition/Mediation - Cunningham v. Wallace and Graham

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**Andrew Perrong** <[a@perronglaw.com](mailto:a@perronglaw.com)>

Mon, Mar 31, 2025 at 11:13 AM

To: "Flynn, Virginia Bell" <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>

Cc: Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>, "Fuller, Chad" <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>, "Conkle, Brooke K." <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

Counsel,

Without any recommendations from other counsel or any demonstrated experience in TCPA matters or at minimum complex matters such as this one, we cannot agree to either of these proposals. Moreover, the fact that these recommendations come from your clients and the fact that your clients mediated claims with them in a representative capacity in the past raises issues of potential bias. We have looked at the District Court's mediator list and would be comfortable with the following:

Hon. James A. Beaty, Jr.

Mr. Reginald F. Combs

Reagan H. Weaver

[Quoted text hidden]

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**Flynn, Virginia Bell** <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>

Tue, Apr 1, 2025 at 12:32 PM

To: Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>

Cc: Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>, "Fuller, Chad" <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>, "Conkle, Brooke K." <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

We will run these by the clients. Thanks.

**Virginia Bell Flynn**

Partner

**troutman pepper locke**

Direct: 704.916.1509 | Mobile: 843.847.9766

[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

---

**From:** Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>

**Sent:** Monday, March 31, 2025 11:13 AM

**To:** Flynn, Virginia Bell <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>

**Cc:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>; Fuller, Chad <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>; Conkle, Brooke K. <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

**Subject:** Re: Deposition/Mediation - Cunningham v. Wallace and Graham

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**Flynn, Virginia Bell** <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>

Wed, Apr 2, 2025 at 7:09 PM

To: Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>

Cc: Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>, "Fuller, Chad" <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>, "Conkle, Brooke K." <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

Can y'all check on dates for Judge Beaty?

**Virginia Bell Flynn**

**Partner**

**troutman pepper locke**

Direct: 704.916.1509 | Mobile: 843.847.9766

[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

---

**From:** Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>

**Sent:** Monday, March 31, 2025 11:13 AM

**To:** Flynn, Virginia Bell <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>

**Cc:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>; Fuller, Chad <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>; Conkle, Brooke K. <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

**Subject:** Re: Deposition/Mediation - Cunningham v. Wallace and Graham

...

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**Andrew Perrong** <[a@perronglaw.com](mailto:a@perronglaw.com)>

Wed, Apr 2, 2025 at 7:21 PM

To: "Flynn, Virginia Bell" <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>

Cc: Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>, "Fuller, Chad" <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>, "Conkle, Brooke K." <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

We sure can.

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---

**Flynn, Virginia Bell** <Virginia.Flynn@troutman.com>

Wed, Apr 2, 2025 at 7:23 PM

To: Andrew Perrong <a@perronglaw.com>

Cc: Anthony Paronich <anthony@paronichlaw.com>, "Fuller, Chad" <Chad.Fuller@troutman.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>

Thanks!

## Virginia Bell Flynn

**Partner**

**troutman pepper locke**

Direct: 704.916.1509 | Mobile: 843.847.9766

[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

---

**From:** Andrew Perrong <a@perronglaw.com>

**Sent:** Wednesday, April 2, 2025 7:22 PM

**To:** Flynn, Virginia Bell <Virginia.Flynn@troutman.com>

**Cc:** Anthony Paronich <anthony@paronichlaw.com>; Fuller, Chad <Chad.Fuller@troutman.com>; Conkle, Brooke K. <Brooke.Conkle@troutman.com>

**Subject:** Re: Deposition/Mediation - Cunningham v. Wallace and Graham

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---

**Flynn, Virginia Bell** <Virginia.Flynn@troutman.com>

Wed, Apr 9, 2025 at 6:36 PM

To: Andrew Perrong <a@perronglaw.com>

Cc: Anthony Paronich <anthony@paronichlaw.com>, "Fuller, Chad" <Chad.Fuller@troutman.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>

Following up here. We really have to get a deposition date on the calendar asap. I know we are trying to get a mediation going, but right now we need a depo date. The clients are getting frustrated.

## Virginia Bell Flynn

**Partner**

**troutman pepper locke**

Direct: 704.916.1509 | Mobile: 843.847.9766

[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

---

**From:** Andrew Perrong <a@perronglaw.com>

**Sent:** Wednesday, April 2, 2025 7:22 PM

**To:** Flynn, Virginia Bell <Virginia.Flynn@troutman.com>

**Cc:** Anthony Paronich <anthony@paronichlaw.com>; Fuller, Chad <Chad.Fuller@troutman.com>; Conkle, Brooke K. <Brooke.Conkle@troutman.com>

**Subject:** Re: Deposition/Mediation - Cunningham v. Wallace and Graham



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---

**Anthony Paronich** <anthony@paronichlaw.com>

Wed, Apr 9, 2025 at 6:38 PM

To: "Flynn, Virginia Bell" <Virginia.Flynn@troutman.com>

Cc: Andrew Perrong <a@perronglaw.com>, "Fuller, Chad" <Chad.Fuller@troutman.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>

I hear that, we'll get back to you, but we're deposing your client as well. We'll then do a mediation after the depositions.

-----  
Anthony Paronich  
Paronich Law, P.C.  
350 Lincoln Street, Suite 2400  
Hingham, MA 02043  
[o] (617) 485-0018  
[c] (508) 221-1510  
[f] (508) 318-8100

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**Flynn, Virginia Bell** <Virginia.Flynn@troutman.com>

Wed, Apr 9, 2025 at 6:39 PM

To: Anthony Paronich <anthony@paronichlaw.com>

Cc: Andrew Perrong <a@perronglaw.com>, "Fuller, Chad" <Chad.Fuller@troutman.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>

That's fine, but we sent out a depo notice a long time ago. We are entitled to a date asap.

## Virginia Bell Flynn

Partner

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Direct: 704.916.1509 | Mobile: 843.847.9766

[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

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**From:** Anthony Paronich <anthony@paronichlaw.com>

**Sent:** Wednesday, April 9, 2025 6:38 PM

**To:** Flynn, Virginia Bell <Virginia.Flynn@troutman.com>

**Cc:** Andrew Perrong <a@perronglaw.com>; Fuller, Chad <Chad.Fuller@troutman.com>; Conkle, Brooke K. <Brooke.Conkle@troutman.com>

**Subject:** Re: Deposition/Mediation - Cunningham v. Wallace and Graham

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**Anthony Paronich** <anthony@paronichlaw.com>

Wed, Apr 9, 2025 at 6:41 PM

To: "Flynn, Virginia Bell" <Virginia.Flynn@troutman.com>

Cc: Andrew Perrong <a@perronglaw.com>, "Fuller, Chad" <Chad.Fuller@troutman.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>



Ok, if you want me to unilaterally notice a date of your clients, we'll do that too. Seems inefficient, but I'll note that when your firm inevitably wants one of the many extensions they've asked me for.

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**Flynn, Virginia Bell** <Virginia.Flynn@troutman.com>

Wed, Apr 9, 2025 at 6:42 PM

To: Anthony Paronich <anthony@paronichlaw.com>

Cc: Andrew Perrong <a@perronglaw.com>, "Fuller, Chad" <Chad.Fuller@troutman.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>

We certainly didn't show up to the date and claim your client wasn't there. Just give us a date. It's not a big deal.

## Virginia Bell Flynn

**Partner**

**troutman pepper locke**

Direct: 704.916.1509 | Mobile: 843.847.9766

[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

---

**From:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

**Sent:** Wednesday, April 9, 2025 6:41 PM

**To:** Flynn, Virginia Bell <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>

**Cc:** Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>; Fuller, Chad <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>; Conkle, Brooke K. <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

**Subject:** RE: Deposition/Mediation - Cunningham v. Wallace and Graham

[Quoted text hidden]

---

**Anthony Paronich** <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

Wed, Apr 9, 2025 at 6:43 PM

To: "Flynn, Virginia Bell" <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>

Cc: Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>, "Fuller, Chad" <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>, "Conkle, Brooke K." <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

Right, but the fact that you failed to cooperate on coordinating a date before serving a notice doesn't entitle you to anything quicker than we're entitled to.

In any event, Brooke, I still haven't heard from you following our meet and confer on Mr. Cooper. I'm going to reopen that thread now and we'll look for your position or Andrew and I will file a motion to compel on Monday.

-----  
Anthony Paronich  
Paronich Law, P.C.  
350 Lincoln Street, Suite 2400  
Hingham, MA 02043  
[o] (617) 485-0018  
[c] (508) 221-1510  
[f] (508) 318-8100

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**Fuller, Chad** <Chad.Fuller@troutman.com>

Wed, Apr 9, 2025 at 6:47 PM

To: Anthony Paronich <anthony@paronichlaw.com>, "Flynn, Virginia Bell" <Virginia.Flynn@troutman.com>

Cc: Andrew Perrong <a@perronglaw.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>

Let's cool the temperature here Anthony. Just get us a date by Friday and we will proceed with that. OK?

## **Chad R. Fuller**

**Partner**

**troutman pepper**

Direct: 858.509.6056 | Mobile: 760.828.8130 | Internal: 19-6056

[chad.fuller@troutman.com](mailto:chad.fuller@troutman.com)

---

**From:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

**Sent:** Wednesday, April 9, 2025 3:43:56 PM

**To:** Flynn, Virginia Bell <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>

**Cc:** Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>; Fuller, Chad <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>; Conkle, Brooke K. <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

**Subject:** Re: Deposition/Mediation - Cunningham v. Wallace and Graham

[Quoted text hidden]

---

**Anthony Paronich** <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

Wed, Apr 9, 2025 at 6:48 PM

To: "Fuller, Chad" <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>

Cc: "Flynn, Virginia Bell" <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>, Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>, "Conkle, Brooke K." <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

I'll get a date and we'll agree to exchange a date for your client at the same time.

-----  
Anthony Paronich  
Paronich Law, P.C.  
350 Lincoln Street, Suite 2400  
Hingham, MA 02043  
[o] (617) 485-0018  
[c] (508) 221-1510  
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**Fuller, Chad** <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>

Wed, Apr 9, 2025 at 6:51 PM

To: Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

Cc: "Flynn, Virginia Bell" <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>, Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>, "Conkle, Brooke K." <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

We have a number of clients on our end with no depo notices from you. I am not quite sure what you're saying here.

**Chad R. Fuller**

**Partner**

**troutman pepper**

Direct: 858.509.6056 | Mobile: 760.828.8130 | Internal: 19-6056

[chad.fuller@troutman.com](mailto:chad.fuller@troutman.com)

---

**From:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

**Sent:** Wednesday, April 9, 2025 3:48:25 PM

**To:** Fuller, Chad <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>

**Cc:** Flynn, Virginia Bell <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>; Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>; Conkle, Brooke K. <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

**Subject:** Re: Deposition/Mediation - Cunningham v. Wallace and Graham

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**Flynn, Virginia Bell** <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>

Wed, Apr 9, 2025 at 6:54 PM

To: Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

Cc: Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>, "Fuller, Chad" <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>, "Conkle, Brooke K." <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

What is Mr. Cooper? There is no Mr. Cooper in this case.

**Virginia Bell Flynn**

**Partner**

**troutman pepper locke**

Direct: 704.916.1509 | Mobile: 843.847.9766

[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

---

**From:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

**Sent:** Wednesday, April 9, 2025 6:43:56 PM

**To:** Flynn, Virginia Bell <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>

**Cc:** Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>; Fuller, Chad <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>; Conkle, Brooke K. <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

**Subject:** Re: Deposition/Mediation - Cunningham v. Wallace and Graham

[Quoted text hidden]

---

**Anthony Paronich** <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

Wed, Apr 9, 2025 at 6:56 PM

To: "Flynn, Virginia Bell" <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>

Cc: Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>, "Fuller, Chad" <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>, "Conkle, Brooke K." <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

Just a separate case that your firm represents the Defendant in where our meet and confer efforts have been ignored.

You are correct that there is no Mr. Cooper in this case. I'm sorry if you misunderstood my e-mail and assumed I was saying there was.

[Quoted text hidden]

---

**Anthony Paronich** <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

Thu, Apr 10, 2025 at 11:50 AM

To: "Fuller, Chad" <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>

Cc: "Flynn, Virginia Bell" <Virginia.Flynn@troutman.com>, Andrew Perrong <a@perronglaw.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>

Chad:

As I had previously mentioned, we wanted to depose the individuals who verified the discovery responses. Unless Andrew and I are missing something, your client didn't provide a verification page. Please advise. In any event, we also now a few other individuals we want to depose, so attached are deposition notices for: (a) Ricky A. LeBlanc (b) Mona Lisa Wallace and (c) Joel R. Rhine.

Regarding the Plaintiff's Deposition, we have multiple dates we are prepared to offer at the end of April and beginning of May. However, as I mentioned, we are only interested in a mutual exchange of available dates. We have no problem with Mr. Cunningham going first, but we aren't going to schedule his deposition without scheduling the others.

Regards,

[Quoted text hidden]

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**3 attachments**



**Notice of Deposition (Rhine).pdf**  
54K



**Notice of Deposition (Wallace).pdf**  
54K



**Notice of Deposition (LeBlanc).pdf**  
54K

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**Flynn, Virginia Bell** <Virginia.Flynn@troutman.com>

Thu, Apr 10, 2025 at 12:04 PM

To: Anthony Paronich <anthony@paronichlaw.com>, "Fuller, Chad" <Chad.Fuller@troutman.com>

Cc: Andrew Perrong <a@perronglaw.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>

Anthony,

Please provide us the dates for April and May. We will talk to our clients and work on providing dates as soon as we can, but we will not agree to a mutual exchange. We sent out a depo notice and have been asking for dates since February. It is April and this is the first time you have asked for dates and the first day we have even seen a deposition notice.

If you do not send dates over today, we will file a Motion to Compel. This ultimately seems like a waste of time and I truly hope y'all will stop playing games, provide us a date, and we will work on our end to give you dates. The legal bar is small, and collegiality still remains an important part of being a lawyer. We will work to be collegial and we hope y'all will as well.

Thanks.

Virginia

## Virginia Bell Flynn

**Partner**

**troutman pepper locke**

Direct: 704.916.1509 | Mobile: 843.847.9766

[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

---

**From:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

**Sent:** Thursday, April 10, 2025 11:51 AM

**To:** Fuller, Chad <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>

**Cc:** Flynn, Virginia Bell <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>; Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>; Conkle, Brooke K. <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

**Subject:** RE: Deposition/Mediation - Cunningham v. Wallace and Graham

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**Anthony Paronich** <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>

Thu, Apr 10, 2025 at 12:06 PM

To: "Flynn, Virginia Bell" <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>, "Fuller, Chad" <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>

Cc: Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>, "Conkle, Brooke K." <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

Understood, we'll provide dates or respond to your motion as necessary.

If we do not receive your client's signed verification page today, we'll also file a motion to compel. I truly hope you all will also stop playing games.

----

Anthony Paronich

Paronich Law, P.C.

[350 Lincoln Street, Suite 2400](#)

[Hingham, MA 02043](#)

[o] (617) 485-0018

[c] (508) 221-1510

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**Andrew Perrong** <a@perronglaw.com>

Thu, Apr 10, 2025 at 2:35 PM

To: Anthony Paronich <anthony@paronichlaw.com>

Cc: "Flynn, Virginia Bell" <Virginia.Flynn@troutman.com>, "Fuller, Chad" <Chad.Fuller@troutman.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>

Counsel:

The latest communication we had from you is on March 3, 2025 (attached) indicating that you wanted to schedule Mr. Cunningham's deposition the day after our mediation in the event it was not successful and owing to the fact that everything was going to be in person. So it's demonstrably false that the current state of affairs is that "We sent out a depo notice and have been asking for dates since February." Be sure to include that in any motion you file with the Court regarding our meet and confer position, as we certainly will include those email conversations in any response.

From: Flynn, Virginia Bell <Virginia.Flynn@troutman.com>

Sent: Monday, March 3, 2025 12:38 PM

To: Anthony Paronich <anthony@paronichlaw.com>; Fuller, Chad <Chad.Fuller@troutman.com>

Subject: Re: Cunningham v. Sokolove -- Third Party Complaint/Mediation

We had a good call with the client. They seem comfortable with scheduling a mediation the day before the depo. We are encouraging them to file the TPC asap. Will report back. The 12th is off but we need to get it scheduled soon.

**Virginia Bell Flynn**

Partner

**troutman pepper locke**

Direct: 704.916.1509 | Mobile: 843.847.9766

[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

So then you sent us the instant email on Wednesday which kicked off this entire issue, which represents a departure from your previous position. Litigants and attorneys are entitled to change positions, but not to misrepresent the history of meet and confer positions. So, your client has decided to prioritize depositions instead of mediation, and that's fine, but we are entitled to as well. We are still willing to do a mutual exchange of dates, but will obviously reserve our rights to respond to a motion in any manner we and our client deem appropriate, especially if it does not accurately reflect the history of our communications.

Finally, as Anthony indicated, we haven't received a verification page. So, it seems disingenuous to pivot your position a day ago, ask for an immediate response but for your clients to not comply with the requirements of Rule 33 for more than a month.

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**Flynn, Virginia Bell** <Virginia.Flynn@troutman.com>

Thu, Apr 10, 2025 at 2:39 PM

To: Andrew Perrong <a@perronglaw.com>, Anthony Paronich <anthony@paronichlaw.com>

Cc: "Fuller, Chad" <Chad.Fuller@troutman.com>, "Conkle, Brooke K." <Brooke.Conkle@troutman.com>

What are the proposed dates? All you have to do is give us some dates and we can stop going back and forth. Seems like you have them so it truly seems as if you are playing games at this point.

**Virginia Bell Flynn**

Partner

**troutman pepper locke**

Direct: 704.916.1509 | Mobile: 843.847.9766  
[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

---

**From:** Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>  
**Sent:** Thursday, April 10, 2025 2:35:41 PM  
**To:** Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>  
**Cc:** Flynn, Virginia Bell <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>; Fuller, Chad <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>; Conkle, Brooke K. <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>  
**Subject:** Re: Deposition/Mediation - Cunningham v. Wallace and Graham

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**Anthony Paronich** <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)> Thu, Apr 10, 2025 at 2:44 PM  
To: "Flynn, Virginia Bell" <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>, Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>  
Cc: "Fuller, Chad" <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>, "Conkle, Brooke K." <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

We'll respond to your motion. But Andrew gave you the courtesy of showing how you were misrepresenting the status of the conversation instead of simply doing so with the Court, which we also intend to do.

Also, feel free to recognize that discovery isn't a one-way street and propose dates for our requested deponents as well. Furthermore, I believe all of your e-mails have ignored the fact that we don't have a verification page from your client. Is your position that you don't have to provide one? That it was already provided and somehow did not make it to us? You accuse us of playing games and then conveniently ignore anything that requires participation from your client.

[Quoted text hidden]

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From: Flynn, Virginia Bell <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>  
Sent: Monday, March 3, 2025 12:58 PM  
To: Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>; Fuller, Chad <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)>  
Subject: Re: Cunningham v. Sokolove -- Third Party Complaint/Mediation

We had a good call with the client. They seem comfortable with scheduling a mediation the day before the depo. We are encouraging them to file the TPC asap. Will report back. The 12th is off but we need to get it scheduled soon.

**Virginia Bell Flynn**  
Partner  
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Direct: 704.916.1509 | Mobile: 843.847.9766  
[virginia.flynn@troutman.com](mailto:virginia.flynn@troutman.com)

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[Quoted text hidden]

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**Fuller, Chad** <[Chad.Fuller@troutman.com](mailto:Chad.Fuller@troutman.com)> Thu, Apr 10, 2025 at 3:27 PM  
To: Anthony Paronich <[anthony@paronichlaw.com](mailto:anthony@paronichlaw.com)>, "Flynn, Virginia Bell" <[Virginia.Flynn@troutman.com](mailto:Virginia.Flynn@troutman.com)>, Andrew Perrong <[a@perronglaw.com](mailto:a@perronglaw.com)>  
Cc: "Conkle, Brooke K." <[Brooke.Conkle@troutman.com](mailto:Brooke.Conkle@troutman.com)>

we have a verification, and we will flip it to you shorty. What's with all the chest pounding? Can't we just get a date for our depo and we will work to get you whatever dates you need.

**Chad R. Fuller**

**Partner**

**troutman pepper**

Direct: 858.509.6056 | Mobile: 760.828.8130 | Internal: 19-6056  
[chad.fuller@troutman.com](mailto:chad.fuller@troutman.com)



**Subject:** RE: Deposition/Mediation - Cunningham v. Wallace and Graham